

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

Case No. 1:25-cv-00800

ROCKEFELLER PHOTOS, LLC,

Plaintiff,

v.

KENWOOD GOLF & COUNTRY CLUB,

Defendant.

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**PLAINTIFF'S MOTION FOR EXTENSION OF TIME  
FOR DEFENDANT TO RESPOND TO COMPLAINT**

Plaintiff Rockefeller Photos, LLC ("Plaintiff") hereby files this motion for an extension of time for defendant Kenwood Golf & Country Club ("Defendant") to file its response to the Complaint, and in support thereof state as follows:

1. On March 11, 2025, Plaintiff filed its Complaint. See D.E. 1.
2. On March 14, 2025, Defendant was served with the Summons and the Complaint. See D.E. 6. As such, Defendant's Answer or responsive pleading is due April 4, 2025.
3. On March 24, 2025, Plaintiff's counsel received a telephone call from Defendant requesting a 30-day extension to file an answer or response to the Complaint to allow for submission of an insurance claim and possible settlement discussions to take place.
4. Plaintiff now requests that Defendant be given an additional thirty (30) days to file its response to the Complaint, to allow the parties time to attempt resolution.
5. The requested relief is made in good faith and prior to the current deadlines. The relief being sought will neither unfairly prejudice Plaintiff or Defendant, nor cause undue delay.

**WHEREFORE**, Plaintiff respectfully requests that the Court enter an Order: (a) granting

this Motion, (b) extending the deadline for Defendant to file its response to the Complaint on or before May 5, 2025<sup>1</sup>.

Dated: March 26, 2025.

COPYCAT LEGAL PLLC  
3111 N. University Drive  
Suite 301  
Coral Springs, FL 33065  
Telephone: (877) 437-6228  
[dan@copycatlegal.com](mailto:dan@copycatlegal.com)

By: /s/ Daniel DeSouza  
Daniel DeSouza, Esq.

### **CERTIFICATE OF SERVICE**

I hereby certify that on March 26, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will electronically serve all counsel of record. I further certify that on March 26, 2025, the foregoing document was served via US Mail to Kenwood Golf & Country Club, 5601 River Road Bethesda, MD 20816 and via electronic mail to [bill@kenwoodcc.net](mailto:bill@kenwoodcc.net) and [ap@kenwoodcc.net](mailto:ap@kenwoodcc.net).

By: /s/ Daniel DeSouza  
Daniel DeSouza, Esq.

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<sup>1</sup> Thirty (30) days from April 4, 2025 is Sunday, May 4, 2025. As such, the due date would be Monday, May 5, 2025.